

M e m o

Date: August 29, 1997
To: Jon Peterson
From: Liz Bartz
Subject: Albion-Sheridan Township Landfill Final Design

cc: 19740



Earth Tech has reviewed the comment/response letter prepared by Woodward-Clyde dated August 4, 1997 and the Final Design submitted on August 20, 1997. A more focused review was performed for the Model Health and Safety Plan and Drum Management Plan. For the most part, it appears that the comments were adequately addressed. There are a couple of exceptions, however, that we are pointing out to you. At this point though, I would merely like to get this in the record and let you choose whether or not you wish to pass these along.

VOLUME 2 OF 3, REMEDIAL ACTION WORK PLAN

MODEL HEALTH AND SAFETY PLAN

As was expected by the comment/response letter, the PRP group did not fully address our comments provided for the 95% Design Review on the Health and Safety Plan. The August 1997 Model Health and Safety Plan does not fully comply with the OSHA 29 CFR 1910.120 (HAZWOPER regulations). As requested in your phone message to me on 8/24/97, our review and subsequent comments focus on the decontamination, drum management, and perimeter sampling procedures as they relate to the protection of the public.

Section 6.0 Air Quality Monitoring and Mitigative Measures for Control of Emissions

The perimeter sampling procedure is outlined in this section. Assumptions have been made in the plan in determining the perimeter strategy. The validity of the assumptions is not known, therefore the adequacy of the perimeter sampling method cannot be ascertained.

For example, Section 4.5.1 states that airborne contaminants are expected to be low during the construction activities. However, Section 4.1.1 states the following: "The landfill ranges from 16 to 35 feet in thickness and is producing landfill gases in the form of methane gas and volatile organic compounds (VOCs) in concentrations exceeding 10,000 ppm."

Also, an assumption is made in Section 6.0 that the only source of flammable gases or vapors is from the construction activities. This assumption precludes additional gases or vapors generated either from natural migration out of the soil, or from other operational activities, which, in combination with the construction activities, may increase readings at the perimeter.

It is not clear from reading Section 6.2 what the action levels for the perimeter fencing will be. The plan states that for the fence line monitoring that there will be no option to upgrade PPE based on elevated air readings. Does this mean that work stops at readings at the fence line that would normally require worker upgrade to Level C, or, that work stoppage will occur until readings that would require work zone evacuation?

Section 9.0 Decontamination Procedures

The decontamination requirements outlined in the section do not fully address the appropriate decontamination procedures. Examples of procedures needing to be addressed prior to performance of work include:

- a. The PPE required for tool and equipment decontamination is not specified in the plan.
- b. No statement is present as to what criteria is to be used to determine when equipment has been properly decontaminated (i.e. all visible particulates removed)

Section 10.0 Emergency Response Plan

The Emergency Response Plan does not address public protection in the event of an emergency. I.e. what mechanisms will be in place to notify and evacuate the public (ie. particularly those individuals in the subdivision.)

DRUM MANAGEMENT PLAN

The drum management plan appears to be adequate from the information currently available. We do have a concern, however, of the general location of the drum staging area. It is located along the fence line on the east side of the landfill. Although the plan states that they will be contained within a locked/fenced compounds, the period of time that the drums will be excavated and the staging is to occur will be during the winter when the leaves have fallen from the trees. Is it your intent to keep the temporary fence around the site during that time period?

Their close proximity may invite curious individuals from the public to come over to the staging area. In addition, there is not a specific perimeter air monitoring procedure outlined for the excavation and opening of any drums, nor for the drum staging area.